

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VICTOR ENCARNACION, KALEB HAGOS,  
KENNETH CLAVASQUIN, and  
THE BRONX DEFENDERS, individually and  
on behalf of a class of all others similarly  
situated,

Plaintiffs,

– against –

THE CITY OF NEW YORK,

Defendant.

16-cv-156 (DLC)

**NOTICE OF MOTION TO ENFORCE  
THE SO-ORDERED SETTLEMENT AGREEMENT**

PLEASE TAKE NOTICE that Plaintiffs will move this Court on a return date to be determined by the Court for an order extending the court-ordered settlement agreement for one year and requiring Defendant to demonstrate compliance with Paragraph 16 of that agreement within the one year extension period. In support of this motion, Plaintiffs submit the attached Memorandum of Law in Support of their Motion to Enforce the So-Ordered Settlement Agreement and the Declarations of Niji Jain and Adam Shoop, both dated October 29, 2020, and the exhibits annexed thereto.

Dated: October 29, 2020  
Bronx, NY

Respectfully submitted,

/s/ Niji Jain  
Niji Jain  
Adam N. Shoop  
Jenn Rolnick Borchetta  
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